



M.J."MIKE" FOSTER, JR.
GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
OFFICE OF CONSERVATION

JACK C. CALDWELL
SECRETARY

PHILIP N. ASPRODITES
COMMISSIONER OF CONSERVATION

January 23, 2002

Mr. William S. Strain
STRAIN, DENNIS, MAYHALL & BATES, L.L.P.
318 St. Charles Street
Baton Rouge, LA 70802

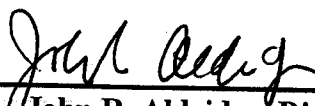
RE: EMERGENCY REQUEST OF January 22, 2001
SAND(s): UPPER MARG A SAND, RESERVOIR A
FIELD: NORTH HELL HOLE BAYOU FIELD
PARISH: Vermilion Parish, Louisiana
APPLICANT: SENECA RESOURCES CORPORATION

Dear Mr. Strain:

Because of the reason set forth in your emergency request letter, it has been determined that undue hardship would be caused by the 20-day delay prescribed in Rule 3 of the Revised Rules of Procedure, effective October 11, 1983. You are therefore permitted to immediately file your application in compliance with Rule 8 of the Revised Rules of Procedure.

Yours truly,

PHILIP N. ASPRODITES
COMMISSIONER OF CONSERVATION

BY: 
John R. Aldridge, Director
ENGINEERING DIVISION

JRA:dpe

STRAIN, DENNIS, MAYHALL & BATES, L.L.P.

ATTORNEYS AND COUNSELORS AT LAW

318 ST. CHARLES STREET
BATON ROUGE, LOUISIANA 70802
TELEPHONE (225) 343-0100
FAX (225) 343-0344
E-MAIL STRAIN@SDMBLAW.COM

1018 HARDING STREET, SUITE 104
P. O. BOX 53319
LAFAYETTE, LOUISIANA 70505-3319
TELEPHONE (337) 237-5900
FAX (337) 233-9095

WILLIAM S. STRAIN*
PARTNER
BATON ROUGE OFFICE

* Also Admitted In Texas

3838 N. CAUSEWAY BLVD., SUITE 2090
METAIRIE, LOUISIANA 70002
TELEPHONE (504) 830-7649
FAX (504) 830-7635

January 22, 2002

Hon. Philip N. Asprodites
Commissioner of Conservation
P. O. Box 94275
Baton Rouge, Louisiana 70804

Re: Upper Marg A Sand, Reservoir A,
SUA, North Hell Hole Bayou Field,
Vermilion Parish, Louisiana

Dear Commissioner Asprodites:

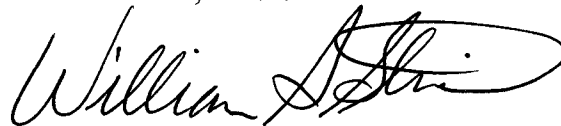
Seneca Resources Corporation ("Seneca"), is the lessee of considerable acreage in the subject field, including the acreage outlined in yellow on the attached plat.

Seneca intends to immediately apply for a public hearing to force pool and unitize in the subject area. However, because the lease colored in yellow on the attached plat expires March 31, 2002, the pre-application requirements of LAC 43:XIX.3907 (Rule 3) of the Revised Rules of Procedure would cause undue hardship to the applicant.

Therefore, Seneca respectfully requests that you waive the pre-application requirements of LAC 43:XIX.3907 (Rule 3) and allow it to tender application immediately under LAC 43:XIX.3917 (Rule 8) of the Revised Rules of Procedure.

Very truly yours,

STRAIN, DENNIS, MAYHALL
& BATES, L.L.P.


William S. Strain

WSS:mw
Enclosure

North Hell Hole Bayou Field

Davis Oil
SL 9842
(121227)
16011

SL 16141

U M A R A S U A
SL 16141 No. 1 ST
+/- 870 ACS.

VERMILION

BAY

Union Oil of Calif.
SL 3566
(101023)

15880

Sohio Pet.
SL 11334
(121480)
*
21253

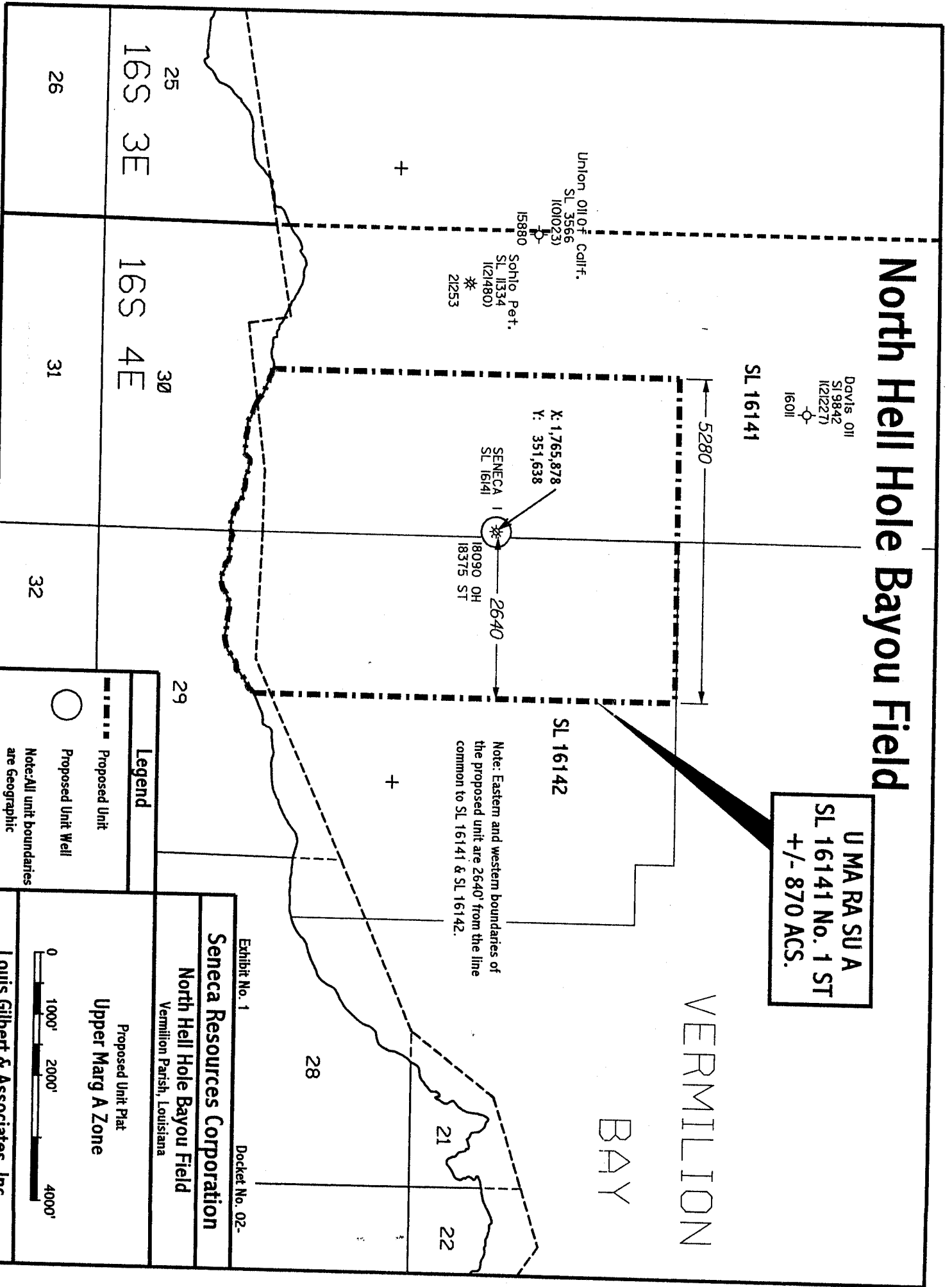
X: 1,765,878
Y: 351,638

SENECA 1
SL 16141

18090 OH
18375 ST

SL 16142

Note: Eastern and western boundaries of the proposed unit are 2640' from the line common to SL 16141 & SL 16142.



Legend



Proposed Unit

Proposed Unit Well

Note: All unit boundaries are Geographic

Exhibit No. 1

Docket No. 02-

Seneca Resources Corporation

North Hell Hole Bayou Field

Vermilion Parish, Louisiana

Proposed Unit Plat

Upper Marg A Zone



Louis Gilbert & Associates, Inc.

STRAIN, DENNIS, MAYHALL & BATES, L.L.P.

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METAIRIE, LOUISIANA 70002
TELEPHONE (504) 830-7649
FAX (504) 830-7635

P. O. BOX 41086
HOUSTON, TEXAS 77241-1086
TELEPHONE (832) 467-2180
FAX (832) 467-2181

January 24, 2002

Hon. Philip N. Asprodites
Commissioner of Conservation
P. O. Box 94275
Baton Rouge, Louisiana 70804

Re: Upper Marg A Zone, Reservoir A
North Hell Hole Bayou Field
Vermilion Parish, Louisiana

Dear Commissioner Asprodites:

Application is hereby made on behalf of Seneca Resources Corporation to the Commissioner of Conservation of the calling of a public hearing, after legal notice, to consider evidence relative to the issuance of an order pertaining to the following matters relating to the Upper Marg A Zone, Reservoir A, in the North Hell Hole Bayou Field, Vermilion Parish, Louisiana:

1. To establish rules and regulations governing the exploration for and production of gas and condensate from the Upper Marg A Zone, Reservoir A in the North Hell Hole Bayou Field, Vermilion Parish, Louisiana.
2. To create a single drilling and production unit for the exploration for and production of gas and condensate for the U MA RA SUA, as shown on the plat attached hereto.
3. To force pool and integrate all separately owned tracts, mineral leases and other property interests within the proposed unit, with each tract sharing in unit production on a surface acreage basis of participation.

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ENGINEERING DIVISION

4. To designate Seneca Resources Corporation as the unit operator of, and the Seneca Resources Corporation - State Lease 16141 No. 1 as the unit for, the unit so created.
5. To provide that the Commissioner of Conservation should be authorized to reclassify the reservoir by supplemental order without the necessity of a public hearing if the producing characteristics of the reservoir changes and evidence to justify such reclassification is submitted to and accepted by the Commissioner of Conservation.
6. To consider such other matters as may be pertinent to this application.

The Upper Marg A Zone, is hereby defined as that gas and condensate bearing interval encountered between the depths of 16,275 feet and 17,225 feet (measured depth) in the Seneca Resources Corporation - State Lease 16141 No. 1 ST Well, located in Township 16 South, Range 4 East, Offshore Vermilion Parish, Louisiana.

In accordance with LAC 43:XIX.3917 (Rule 8) of the Revised Rules of Procedure, the Office of Conservation has waived the pre-application notice requirements and LAC 43:XIX.3907 (Rule 3) shall not apply.

A pre-hearing conference to discuss the application and any opposition thereto is hereby tentatively scheduled for Monday, February 4, 2002 at 3:00 p.m. at our offices 318 St. Charles St., Baton Rouge, Louisiana 70809. PLEASE NOTE THAT THERE IS NO REQUIREMENT THAT YOU ATTEND THIS CONFERENCE. This is merely an invitation to attend and participate if the conference is held and you so desire.

In addition to furnishing the legal notice to all Interested Owners, Represented Parties and Interested Parties, the applicant will provide for posting of the legal notice of the hearing and unit plats in a prominent place in the area of North Hell Hole Bayou Field. Additionally, the legal notice will be published in a newspaper of general circulation in the vicinity of North Hell Hole Bayou Field, at least fifteen (15) days before the hearing date.

All pertinent data relative to the subject application is available for inspection at the Offices of Louis Gilbert & Associates, Inc., 3636 N. Causeway Blvd., Suite 204, Metairie, Louisiana 70002. Any person wishing to inspect such data should call (504) 834-8112 during normal business hours in order to arrange a date and time for such inspection. A copy of any such pertinent data which is not otherwise available from the Office of Conservation can be obtained at the expense of the requesting party.

Attached hereto and made a party hereof is a plat outlining the proposed unit and a list of names and addresses of the Interested Parties, Interested Owners and Represented Parties to whom this notice is being sent. Pursuant to the revised Rules of Procedure, such list of Parties is being

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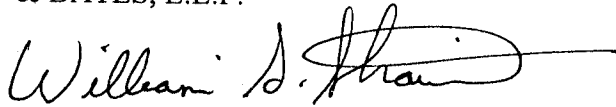
Hon. Philip N. Asprodites
Commissioner of Conservation
Page 3

furnished ONLY to the Commissioner of Conservation. The aforementioned list is available upon request to any Interested Party. A reasonable effort was made to ascertain the names and addresses of all Interested Parties, Interested Owners and Represented Parties as required by the Revised Rules of Procedure.

Also enclosed is our check payable to the Office of Conservation, representing the required hearing application fee.

Very truly yours,

STRAIN, DENNIS, MAYHALL
& BATES, L.L.P.



William S. Strain

WSS:mbw
Enclosures

cc: Mr. Richard Hudson
District Manager

Interested Parties
Interested Owners
Represented Parties

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OFFICE OF CONSERVATION
ENGINEERING DIVISION

North Hell Hole Bayou Field

Davis, OH
SL 9842
1(21227)
16011

SL 16141

U M A R A S U A
SL 16141 No. 1 ST
+/- 870 ACS.

VERMILION

BAY

Union Oil of Calif.
SL 3566
1(01023)
15880
Sohio Pet.
SL 1134
1(21480)
*
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X: 1,765,878
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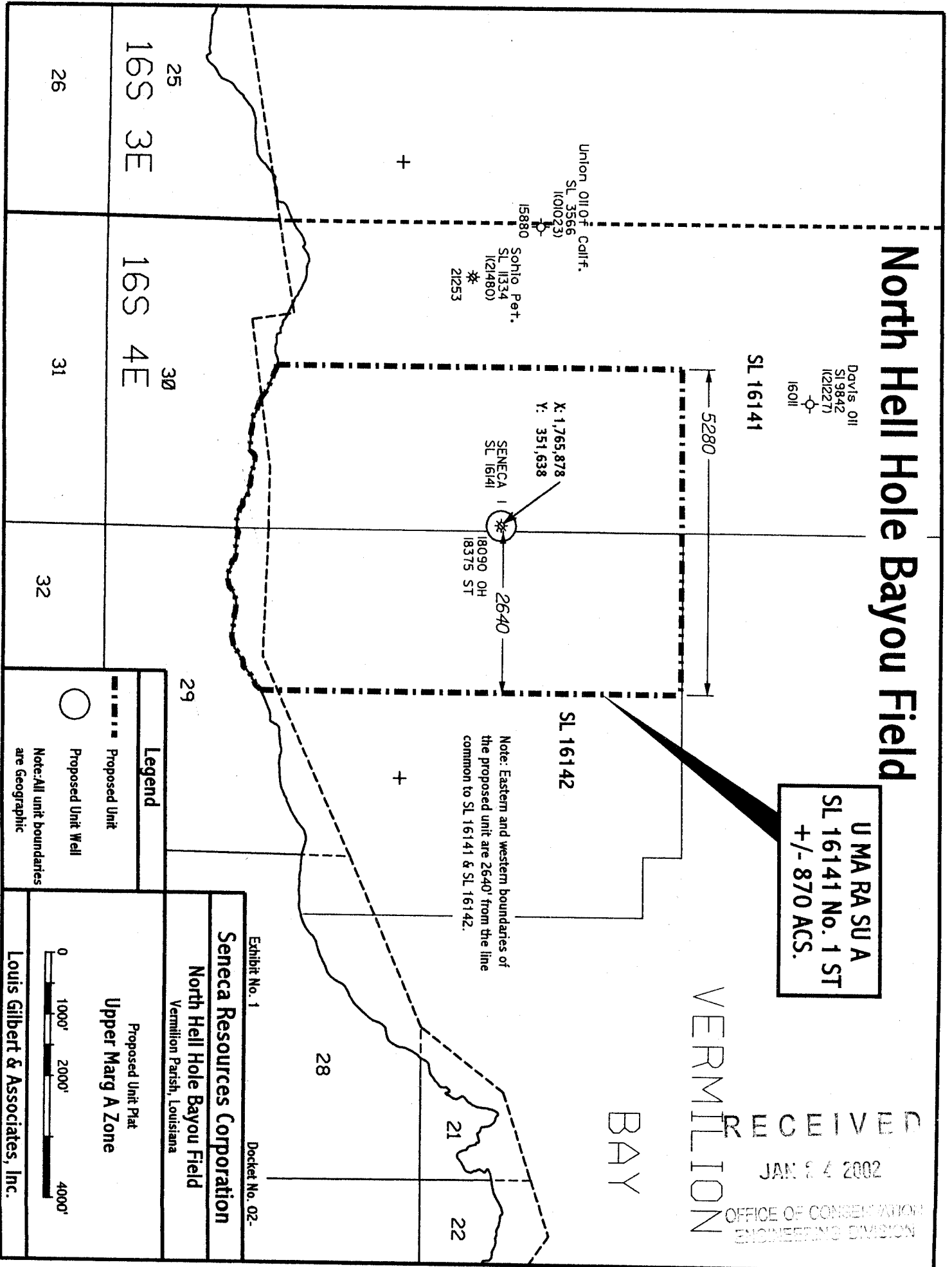
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Seneca Resources Corporation

North Hell Hole Bayou Field

Vermilion Parish, Louisiana

Proposed Unit Plat

Upper Mary A Zone

0 1000' 2000' 4000'

Louis Gilbert & Associates, Inc.

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ENGINEERING DIVISION